

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

**AMERICAN POSTAL WORKERS UNION, AFL-CIO MOTION FOR LEAVE TO
SUBMIT SUPPLEMENTAL DESIGNATION OF WRITTEN CROSS-EXAMINATION**
(March 26, 2012)

By this motion the American Postal Workers Union, AFL-CIO (APWU) requests leave to designate certain interrogatory responses and information request responses by the Postal Service and its witnesses in this case.

This Motion is necessary because the Postal Service filed a number of interrogatory responses last week during four consecutive days of hearings in this matter. Under the time constraints created by those hearings, counsel could not, even though counsel worked diligently to do so, make timely decisions on every interrogatory response provided by the Postal Service in order to have them included in the Commission's hearing record on the day of the testimony to which they relate. The designated responses are, nevertheless, material to the matters before the Commission and should be included in the record in this matter. Furthermore, the granting of this Motion will not prejudice the Postal Service or any Intervener in this case.

Respectfully submitted,

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